

ENGINEERING MANAGEMENT SUPPORT INC.

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October 10, 2014

VIA: Electronic Mail

U.S. Environmental Protection Agency
Region VII SUPR/MOKS
11201 Renner Boulevard
Lenexa, KS 66219

ATTENTION: Mr. Dan Gravatt

SUBJECT: Monthly Status Report – September 2014
West Lake Landfill Operable Unit 1, Bridgeton, Missouri

Dear Mr. Gravatt,

On behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc., and the United States Department of Energy (the "Respondents"), Engineering Management Support Inc. (EMSI) submits the attached status report for the month of September 2014 as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005. If you have any questions or desire additional information related to this status report or any other aspect of the project, please do not hesitate to contact me.

Sincerely,
ENGINEERING MANAGEMENT SUPPORT, Inc.



Paul V. Rosasco, P.E.

Distribution:

Shawn Muenks - Missouri Dept of Natural Resources
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Dan Feezor – Feezor Engineering
Mike Bollenbacher – Auxier & Associates

Monthly Status Report – September 2014
West Lake Landfill Operable Unit 1
Bridgeton, Missouri

This status report has been prepared by Engineering Management Support Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC (formerly known as Laidlaw Waste Systems [Bridgeton] Inc.), Rock Road Industries, Inc., and the United States Department of Energy (the “Respondents”) for Operable Unit - 1 (OU-1) at the West Lake Landfill as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005.

1. Work Performed During September 2014

Project Planning

A draft of the Core Sampling (Phase 1B, 1C and 2) Work Plan for the isolation barrier investigation was submitted to EPA and MDNR on December 18, 2013. EPA comments on the draft work plan were received on December 26, 2013. The final Phase 1B, 1C and 2 Core Sampling Work Plan was submitted on January 8, 2014.

EPA comments on the various work plans prepared for the additional Supplemental Feasibility Study evaluations were received on August 16, 2013. A meeting was held with EPA and MDNR on September 24, 2013 to discuss comments on the work plans for the additional SFS evaluations. Revisions to the work plans for evaluations of alternative Area 2 depths and volumes, apatite treatment technologies and additional discount rate were prepared and submitted to EPA and MDNR on October 31, 2013. A revised work plan for evaluation of alternative landfill cover designs was submitted to EPA and MDNR on February 21, 2014. A revised work plan for performance of fate and transport evaluations was submitted to EPA and MDNR on September 4, 2014. EPA approval of the work plans for additional discount rate evaluations and evaluation of alternative landfill cover designs was received on September 19, 2014.

A draft Remedial Design Work Plan was submitted to EPA in November 2008. In accordance with direction from EPA, all work on design of the ROD-selected remedy has been put on hold.

Fieldwork - Sample Collection/Analysis

Other than continuation of the air monitoring activities associated with Phase 1 of the Thermal Isolation Barrier investigation, no field work was conducted.

Report Preparation

The monthly progress report for August 2014 was prepared and submitted to EPA and MDNR on September 10, 2014.

During September, the following work was performed:

- ☐ Evaluations of volume estimates for the three partial excavation options identified by EPA;
- ☐ Preparation of a comprehensive groundwater report; and
- ☐ Preparation of a summary report for the Phase 1 drilling and sampling investigation of potential areas for locating a thermal/isolation barrier between the North Quarry area of the Bridgeton Landfill and West Lake Landfill Area 1.

Pursuant to EPA approval of the work plans for additional discount rates evaluations and evaluation of alternative landfill cover designs, work was initiated on these evaluations during September.

Project Management

None.

Meetings

None.

Correspondence

None.

2. Analytical Data Collected During This Reporting Period

An analytical report for samples collected as part of the Isolation Barrier investigations was received during this period. Specifically, the laboratory report (Eberline nos. 14-08008) for the results of ongoing air monitoring was received. This report is included with the submittal of this status report.

3. Work Scheduled to be Performed during October and November 2014

The following activities will be performed during October and November 2014:

- ☐ Preparation of a summary report that presents the data from the four additional groundwater monitoring events (July/August 2012, April 2013, July 2013, and October 2013) and provides interpretation of the results for the four events;
- ☐ Evaluations to estimate volumes for the partial excavation options identified by EPA;
- ☐ Evaluations of present worth cost estimates for the alternatives in the SFS using additional discount rates;
- ☐ Evaluation of the potential application of an alternative landfill cover that incorporates a geosynthetic clay liner (GCL) into the design of the cover for OU-1; and
- ☐ Preparation of the Bridgeton Landfill Thermal Isolation Barrier Investigation Phase 1 Report that summarizes the results of the Phase 1 drilling and sampling associated with investigation of potential areas for locating a thermal/isolation barrier.

4. Problems Encountered

On September 29, 2014, it was discovered that one of the two air samplers being operated voluntarily as a continuation of the air monitoring activities associated with the Phase 1 drilling and sampling activities (completed in April 2014) had ceased operating. Specifically, the air sampler located adjacent to the Transfer Station had ceased operating sometime during September. The filter in this sampler was collected and submitted for analyses, although the exact length of time the sampler operated during this period is uncertain. EPA provided final comments on the Air Monitoring, Sampling and QA/QC Plan for the Isolation Barrier Preconstruction Activities (discussed in the separate monthly progress report for the Isolation Barrier Preconstruction Work) on September 23, 2014 and therefore, implementation of the comprehensive air monitoring plan, which includes a permanent air monitoring station adjacent to the transfer station, appears imminent. Consequently, a decision was made not to order replacement equipment for the failed sampling device but instead to move forward with implementation of the comprehensive air monitoring program installation and operation upon receipt of EPA approval of the plan.